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July 13, 2022

**Via ECF**

Hon. Robert W. Lehrburger  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**USDC SDNY**  
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Re: Barreto Pelon, et al v. Gabi Operating Corp., et al  
Docket No.: 19-cv-00502 (RWL)

Your Honor:

Our office represents Plaintiffs in the above-referenced matter. I write to respectfully request a brief extension of time to file all materials necessary for preliminary approval of a Rule 23 class-wide settlement, from today, Wednesday, July 13, 2022, to Monday, July 18, 2022. Defendants consent to the within application.

Late this afternoon, the parties finalized the terms and conditions of their Rule 23 Settlement Agreement (“Agreement”) and Defendants have signed same. The request for this brief extension will give our firm time to meet with the twenty-eight Plaintiffs we represent, both in-person and remotely, so we can review the Agreement with them.

The parties thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ William K. Oates  
William K. Oates Esq.  
CSM LEGAL, P.C.  
*Attorneys for Plaintiffs*

cc: Ilan Weiser, Esq. (via ECF)  
*Attorney for Defendants*

Request granted. Settlement approval filings must be submitted by July 18, 2022.

SO ORDERED:

  
7/14/2022  
HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

*Certified as a minority-owned business in the State of New York*